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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
v. :  
SAMUEL BETHEA a/k/a "Cartier" : Mag No. 06- 3672 ( MF )

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. From in or about July 2006 to in or about December 2006, in the District of New Jersey and elsewhere, defendant,

SAMUEL BETHEA a/k/a "Cartier"

did knowingly and willfully conspire and agree with others to directly and indirectly, corruptly demand, seek, receive, accept, and agree to receive and accept articles of value personally in return for defendant SAMUEL BETHEA a/k/a "Cartier" being influenced in the performance of his official acts and being induced to do acts in violation of his official duty, contrary to Title 18, United States Code, Sections 201(b)(2)(A) and (C).

In violation of Title 18, United States Code, Section 371.

I further state that I am a Special Agent, and that this complaint is based on the following facts:

SEE ATTACHMENT A

continued on the attached page and made a part hereof.

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Ryan Landers, Special Agent  
Department of Justice, Office of Inspector General

Sworn to before me and subscribed in my presence,

December 18, 2006, at Newark, New Jersey

HONORABLE MARK FALK  
UNITED STATES MAGISTRATE JUDGE

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Signature of Judicial Officer

## **Attachment A**

I, Ryan Landers, a Special Agent with the Department of Justice, Office of Inspector General, having conducted an investigation, and having spoken with other individuals, have knowledge of the following facts:

1. During the time period relevant to this complaint, defendant SAMUEL BETHEA worked at the Federal Correctional Institution at Fort Dix, New Jersey ("FCI Fort Dix"), as a correctional officer.

2. During the time period relevant to this complaint a confidential informant ("CI 1") was an inmate at FCI Fort Dix.

3. Through conversations with CI 1, I learned of a scheme whereby defendant BETHEA agreed with CI 1, and others, to smuggle contraband into FCI Fort Dix, for CI 1, in exchange for money.

4. According to CI 1, on at least four separate occasions between in or about July 2006 and on or about October 12, 2006, defendant BETHEA agreed with CI 1 to smuggle, into FCI Fort Dix, thousands of pouches of rolling tobacco and dozens of packs of cigarettes, in exchange for cash payments from CI 1. In furtherance of this agreement: 1) CI 1 caused thousands of dollars, in cash and money orders, to be sent to an individual, in Camden, New Jersey, associated with defendant BETHEA ("CC1"); and, 2) soon after CC1 received the monies from CI 1, BETHEA smuggled the tobacco products into FCI Fort Dix and gave them to CI 1.

5. According to CI 1, on or about early November 2006, defendant BETHEA and CI 1 agreed that CI 1 would purchase two pre-paid cellular telephones and send them to defendant BETHEA, and defendant BETHEA would smuggle them into FCI Fort Dix for \$2,000.

6. On or about November 6, 2006, federal law enforcement agents caused \$1,990 to be wired, by Western Union, to a second individual associated with defendant BETHEA ("CC2").

7. On or about November 8, 2006, CC2, acting on behalf defendant BETHEA, received a pay-out of \$1,990 at the Super Fresh Grocery store in Ocean City, New Jersey.

8. On or about November 16, 2006, federal law enforcement agents purchased and mailed two LG pre-paid cellular telephones to CC2.

9. On or about November 18, 2006, defendant BETHEA met CI 1 in a bathroom at FCI Fort Dix. Defendant BETHEA provided CI 1 with the two LG cellular telephones that federal law enforcement agents had mailed to CC2.

10. On or about November 19, 2006, defendant BETHEA and CI 1 agreed that CI 1 would purchase four additional pre-paid cellular telephones and send them to defendant

BETHEA, and defendant BETHEA would smuggle them into FCI Fort Dix for \$2,000. Again, CI 1 agreed to have the monies sent by Western Union to CC2, in Ocean City, New Jersey.

11. On or about November 20, 2006, federal law enforcement agents purchased and mailed four pre-paid cellular telephones to CC2.

12. On or about November 27, 2006, CC2 received a payment at the Imperial Check Cashing, in Camden, New Jersey of \$995. On or about December 1, 2006, CC2 received a payment of \$995 at the Super Fresh Grocery store in Ocean City, New Jersey. These payments had purportedly been wired by CI 1 to CC2 (actually the investigating agents initiated the wire transfer).

13. On or about December 1, 2006, defendant BETHEA met CI 1 at FCI Fort Dix, there defendant BETHEA provided CI 1 with two of the four cellular telephones that federal law enforcement agents had mailed to CC2 on or about November 20.

14. I have been informed by United States Federal Bureau of Prisons officials that tobacco products and cellular telephones are prohibited by regulation from the FCI Fort Dix facility.